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HEARING DATE: September 5, 2019 at 11:30 a.m.
OBJECTION DEADLINE: August 30, 2019 at 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:)	Chapter 11 Case
HVI CAT CANYON, INC.,	{	Case No. 19-12417 (MEW)
,	Debtor.)))
)

NOTICE OF DEBTOR'S MOTION TO SURCHARGE COLLATERAL PURSUANT TO 11 U.S.C. §§ 506(c) and 552(b)

PLEASE TAKE NOTICE that a hearing on the annexed Motion ("Motion"), dated August 16, 2019, of HVI Cat Canyon, Inc. ("Debtor"), in the above-captioned chapter 11 case ("Chapter 11 Case"), by its proposed attorneys Weltman & Moskowitz, LLP, for entry of an order: (a) authorizing Debtor to surcharge collateral pursuant to 11 U.S.C. §§ 506(c) and 552(b) as more fully set forth in the Motion; and (b) for such other and further relief as is just and proper, will be held before the Honorable Michael E. Wiles, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 617, One Bowling Green, New York, NY 10004 ("Bankruptcy Court"), on September 5, 2019 at 11:30 a.m. (Eastern Time) ("Hearing").

PLEASE TAKE FURTHER NOTICE that any responses or objections ("Objections") to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court's case filing system, electronically in accordance with General Order M–399 (which can be found at

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http://www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text

searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in

accordance with the customary practices of the Bankruptcy Court and General Order M-399, to

the extent applicable, and served in accordance with General Order M-399, so as to be so filed and

received no later than August 30, 2019 at 4:00 p.m. (Eastern Time) ("Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served,

Debtor may, on or after the Objection Deadline, submit to the Bankruptcy Court an order

substantially in the form of the proposed order annexed to the Motion, which order may be entered

with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend

the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated:

New York, New York August 19, 2019

WELTMAN & MOSKOWITZ, LLP

Proposed Attorneys for Debtor/Debtor in

Possession

By: /s/ Michael L. Moskowitz
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